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September 30, 2022

VIA ECF

Honorable Naomi Reice Buchwald
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Rina Oh n/k/a Rina Oh Amen v. Virgina L. Giuffre*
Case No.: 1-21-cv-08839 (NRB)

Your Honor:

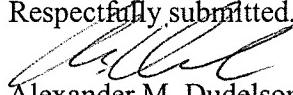
I am the attorney for the plaintiff in the above referenced matter. I was substituted as counsel to the plaintiff by Order dated August 26, 2022. This letter is respectfully submitted to the Court, on the consent of Kathleen R. Thomas, Esq. and Paul G. Cassell, Esq., attorneys for the defendant, as a second Joint Status Report for this proceeding.

Since the date of my substitution, my office has received the plaintiff's file, counsel for the parties engaged in telephone conferences, and the undersigned has been working to complete plaintiff's initial document disclosures.

Based on the foregoing, the parties have stipulated to the following:

1. Initial document disclosures by October 3, 2022;
2. Discovery requests, which have been exchanged, will be held in abeyance upon the completion of plaintiff's initial document disclosures;
3. The parties shall file a proposed confidentiality order on or before October 31, 2022;
4. The parties will hold all information and documents produced in discovery as "confidential" and "attorneys-eyes only" until a confidential order has been issued in this action;
5. After completion of the initial disclosures, the parties will meet and confer about a revision to the existing Scheduling Order, due to the complexities of this case.

Thank you for your consideration herein.

Respectfully submitted,

Alexander M. Dudelson

cc:

Via ECF

Kathleen R. Thomas, Esq.

Paul G. Cassell, Esq.